INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
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100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

February 23, 2004

TO: Interested Parties / Applicant

RE: MignoneCommunications / 069-18356-00059

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 8/11/03

February 23, 2004

Mr. John Mignone
Mignone Communications
880 East State Street
Huntington, Indiana 46750

Re: 069-18356
First Administrative Amendment to
FESOP 069-16460-00059

Dear Mr. Mignone:

Mignone Communications was issued a FESOP on July 21, 2003 for a stationary printing source utilizing three (3) web printing presses, two (2) are heatset presses and one (1) is a nonheatset press. A letter requesting a change was received on January 5, 2004. The change involves the following:

(a) Replacement of two (2) 2.5 million British thermal units per hour (mmBtu/hr) natural gas-fired catalytic oxidizers to one (1) 2.3 mmBtu/hr natural gas-fired regenerative thermal oxidizer. Currently, each heatset press is controlled by a dedicated catalytic oxidizer, now, one regenerative thermal oxidizer will control both heatset presses;

(b) Descriptive change to one (1) six, instead of five, color heatset lithographic web press, identified as Press # 3, with a capacity of 1,378 feet per minute, instead of 1,500 feet per minute (the source will be installing a smaller capacity press than what was permitted). One (1) smaller dryer for Press # 3, rated at 1.13 mmBtu/hr dryer will be installed instead of the permitted one (1) 2.422 mmBtu/hr dryer; and

(c) Condition D.1.8 of the FESOP requires Mignone to stack test Press # 1 between the dates of June 15, 2004 and December 15, 2005; and test Press # 3 within 180 days of startup. Mignone requests to conduct the stack tests for both presses within 180 days of startup of Press # 3, which is the earliest of the two stack testing requirements.

The change qualifies as a"modification that will replace a part or piece of equipment in a process that does not result in an increase actual emissions (see attached page 1 of 1 Appendix A: Emission Calculations for Press # 3 at new capacity, " and a "revision to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term", under 326 IAC 2-8-10. Therefore, the FESOP is hereby administratively amended as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) five-color heatset lithographic web press, identified as Press #1, constructed in 1998, equipped with a ~~2.5~~ **2.3** million British thermal units per hour ~~catalytic oxidizer~~ **regenerative thermal oxidizer** for VOC control, exhausting to Stack 1, capacity: 1,400 feet per minute.

(b) One (1) natural gas-fired dryer, identified as Dryer on Press #1, constructed in 1998, rated at 2.422 million British thermal units per hour.

(c) One (1) five-color non-heatset lithographic web press, identified as Press #2 and operated by Print Support, Inc., constructed in 2001, capacity: 2,844 feet per minute.

(d) One (1) ~~five~~ **six-**color heatset lithographic web press, identified as Press #3, equipped with a ~~2.5~~ **2.3** million British thermal units per hour ~~catalytic oxidizer~~ **regenerative thermal oxidizer** for VOC control, exhausting to Stack ~~2~~ **1,** capacity: ~~1,500~~ **1,378** feet per minute.

(e) One (1) natural gas-fired dryer, identified as Dryer on Press #3, rated at ~~2.422~~ **1.13** million British thermal units per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Printing Presses

(a) One (1) five-color heatset lithographic web press, identified as Press #1, constructed in 1998, equipped with a ~~2.5~~ **2.3** million British thermal units per hour ~~catalytic oxidizer~~ **regenerative thermal oxidizer** for VOC control, exhausting to Stack 1, capacity: 1,400 feet per minute.

(b) One (1) natural gas-fired dryer, identified as Dryer on Press #1, constructed in 1998, rated at 2.422 million British thermal units per hour.

(c) One (1) five-color non-heatset lithographic web press, identified as Press #2 and operated by Print Support, Inc., constructed in 2001, capacity: 2,844 feet per minute.

(d) One (1) ~~five~~ **six-**color heatset lithographic web press, identified as Press #3, equipped with a ~~2.5~~ **2.3** million British thermal units per hour ~~catalytic oxidizer~~ **regenerative thermal oxidizer** for VOC control, exhausting to Stack ~~2~~ **1,** capacity: ~~1,500~~ **1,378** feet per minute.

(e) One (1) natural gas-fired dryer, identified as Dryer on Press #3, rated at ~~2.422~~ **1.13** million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D1.1 through D.1.3 no change

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

(a) through (c) no change

(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the ~~catalytic oxidizers~~ **regenerative thermal oxidizer** for Presses #1 and #3 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the ~~catalytic oxidizers~~ **regenerative thermal oxidizer** shall be greater than 46.5%.

D.1.5 FESOP and PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the potential to emit VOC from the total of the three (3) presses (Press #1, Press #2 and Press #3) shall be limited to less than 99.0 tons per year. This limit shall be achieved by limiting the VOC delivered to the applicators at the presses, such that the potential to emit VOC from these facilities shall be less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and limiting the overall control efficiency of the ~~catalytic oxidizers~~ **regenerative thermal oxidizer** to no less than seventy-one percent (71%). This will limit the potential to emit VOC from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, are not applicable.

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) ~~Pursuant to MSOP 069-14670-00059, issued on November 12, 2001, during the period between June 15, 2004 and December 15, 2005~~, The Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.1.4 and D.1.5 for the ~~catalytic oxidizer~~ **regenerative thermal oxidizer** controlling Press #1. **This test shall be made within one hundred and eighty (180) days after initial startup of Press # 3**. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) Within one hundred and eighty (180) days after initial startup, the Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.1.4 and D.1.5 for the ~~catalytic oxidizer~~ **regenerative thermal oxidizer** controlling Press #3. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.9 no change.

D.1.10 ~~catalytic oxidizer~~ **Regenerative thermal oxidizer** Temperature

(a) ~~A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer controlling emissions from Press #1 for measuring operating temperature. The output of this system shall be recorded as an hourly average. The Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the catalytic oxidizer is below 642EF. The temperature correlates to an overall VOC control efficiency of 98% based on the stack capture and destruction efficiency test conducted on June 15, 1999. An hourly average temperature that is below 642EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~(b)~~ A continuous monitoring system shall be calibrated, maintained, and operated on the ~~catalytic oxidizer~~ **regenerative thermal oxidizer** controlling emissions from **Press 1 and** Press #3 for measuring operating temperature. The output of this system shall be

recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the ~~catalytic oxidizer~~ **regenerative thermal oxidizer** is below 1,400EF. An hourly average temperature that is below 1,400EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(~~c~~ **b**) no change

(~~d~~ **c**) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the ~~catalytic oxidizer~~ **regenerative thermal oxidizer** is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.11 Parametric Monitoring

(a) no change

(b) The duct pressure or fan amperage shall be observed at least once per day for ~~each catalytic oxidizer~~ **regenerative thermal oxidizer** when the **regenerative thermal oxidizer** is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.12 Recordkeeping Requirements

(a) no change

(1) through (4) no change

(5) The continuous temperature records (on an hourly average basis) for ~~each catalytic oxidizer~~ **the regenerative thermal oxidizer** and the hourly average temperature used to demonstrate compliance during the most recent compliant stack tests; and

(6) Daily records of the duct pressure or fan amperage for the ~~each catalytic oxidizer~~ **regenerative thermal oxidizer**.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed bu Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD
cc: File - Huntington County
U.S. EPA, Region V
Huntington County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section
Administrative and Development

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Mignone Communications, Inc.
880 East State Street
Huntington, Indiana 46750

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 069-16460-00059	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 21, 2003 Expiration Date: July 21, 2008

First Administrative Amendment No.:069-18356	Pages Affected: 5, 6, 23, 24, 25, 26, 27
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 23, 2004

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary commercial printing source.

Authorized individual:	President
Source Address:	880 East State Street, Huntington, Indiana 46750
Mailing Address:	880 East State Street, Huntington, Indiana 46750
General Source Phone:	(260) 358-0266
SIC Code:	2752
Source Location Status:	Huntington County Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This commercial printing source consists of a source with an on-site contractor:

(a) Print Support, Inc., the supporting operation, is located at 860 East State Street, Huntington, Indiana 46750; and

(b) Mignone Communications, Inc., the primary operation, is located at 880 East State Street, Huntington, Indiana 46750.

IDEM has determined that Print Support, Inc. and Mignone Communications, Inc. are under the common control of Mignone Communications, Inc. These two (2) plants are considered one (1) source because they are located on contiguous properties, have the same SIC code, the majority of product from one company is input to the other for further processing, and officers of both companies are directly involved with the day to day operations of both companies. Therefore, the term “source” in the FESOP documents refers to both Print Support, Inc. and Mignone Communications, Inc. as one source effective from the date of issuance of MSOP 069-14670-00059, issued on November 12, 2001. One combined FESOP will be issued to Print Support, Inc. and Mignone Communications, Inc. under the name Mignone Communications, Inc.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) five-color heatset lithographic web press, identified as Press #1, constructed in 1998, equipped with a 2.3 million British thermal units per hour regenerative thermal oxidizer for VOC control, exhausting to Stack 1, capacity: 1,400 feet per minute.

(b) One (1) natural gas-fired dryer, identified as Dryer on Press #1, constructed in 1998, rated at 2.422 million British thermal units per hour.

(c) One (1) five-color non-heatset lithographic web press, identified as Press #2 and operated by Print Support, Inc., constructed in 2001, capacity: 2,844 feet per minute.

(d) One (1) six-color heatset lithographic web press, identified as Press #3, equipped with a 2.3 million British thermal units per hour regenerative thermal oxidizer for VOC control, exhausting to Stack 1, capacity: 1,378 feet per minute.

(e) One (1) natural gas-fired dryer, identified as Dryer on Press #3, rated at 1.13 million British thermal units per hour.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers, capacity: 25,848 feet per hour. [326 IAC 6-3-2]

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including one (1) natural gas comfort heater rated at 0.1309 million British thermal units per hour, and the combustion from the dryers and incinerators listed as significant.

(c) One (1) small label press (one (1) ink jet printer), with negligible VOC emissions.

(d) Pre-press operations, including plate processing and film developing with negligible VOC emissions.

(e) One (1) bailer.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

All terms and conditions of previous permits issued for these emission units pursuant to permitting programs approved into the state implementation plan have been either

(a) incorporated as originally stated,

(b) revised, or

(c) deleted

by this permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Printing Presses

(a) One (1) five-color heatset lithographic web press, identified as Press #1, constructed in 1998, equipped with a 2.3 million British thermal units per hour regenerative thermal oxidizer for VOC control, exhausting to Stack 1, capacity: 1,400 feet per minute.

(b) One (1) natural gas-fired dryer, identified as Dryer on Press #1, constructed in 1998, rated at 2.422 million British thermal units per hour.

(c) One (1) five-color non-heatset lithographic web press, identified as Press #2 and operated by Print Support, Inc., constructed in 2001, capacity: 2,844 feet per minute.

(d) One (1) six-color heatset lithographic web press, identified as Press #3, equipped with a 2.3 million British thermal units per hour regenerative thermal oxidizer for VOC control, exhausting to Stack 1, capacity: 1,378 feet per minute.

(e) One (1) natural gas-fired dryer, identified as Dryer on Press #3, rated at 1.13 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from each of the printing presses.

(a) Pursuant to 326 IAC 8-2-5, the VOC content of the ink used at the one (1) non-heatset offset lithographic printing press (Press #2) shall be less than 2.9 pounds of VOC per gallon of coating less water.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from Presses #1 and #3 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

(c) Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

The pounds of VOC per gallon of coating solids shall be limited to less than 4.50 pounds VOC per gallon of coating solids at Presses #1 and #3.

(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the regenerative thermal oxidizer for Presses #1 and #3 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the regenerative thermal oxidizer shall be greater than 46.5%.

D.1.5 FESOP and PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the potential to emit VOC from the total of the three (3) presses (Press #1, Press #2 and Press #3) shall be limited to less than 99.0 tons per year. This limit shall be achieved by limiting the VOC delivered to the applicators at the presses, such that the potential to emit VOC from these facilities shall be less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and limiting the overall control efficiency of the regenerative thermal oxidizer to no less than seventy-one percent (71%). This will limit the potential to emit VOC from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, are not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the catalytic oxidizers to achieve compliance with Conditions D.1.4 and D.1.5.

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) The Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.1.4 and D.1.5 for the regenerative thermal oxidizer controlling Press #1. This test shall be made within one hundred and eighty (180) days after initial startup of Press # 3. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) Within one hundred and eighty (180) days after initial startup, the Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.1.4 and D.1.5 for the regenerative thermal oxidizer controlling Press #3. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC) Emissions

Compliance with Condition D.1.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

VOC emitted (tons) = [VOC input at Presses #1 and #3 (tons) X 0.80 flash off x 0.29 emitted after control] + [VOC input at Press #2 (tons) X 0.05 flash off] + [VOC usage from all cleaners and solvents (tons)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Regenerative thermal oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer controlling emissions from Press #1 and Press #3 for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the regenerative thermal oxidizer is below 1,400EF. An hourly average temperature that is below 1,400EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.4 and D.1.5, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the regenerative thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.11 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack tests that demonstrate compliance with limits in Conditions D.1.4 and D.1.5, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day for regenerative thermal oxidizer when the regenerative thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Recordkeeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Recordkeeping Requirements

(a) To document compliance with Conditions D.1.4, D.1.5, D.1.10 and D.1.11, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage and emission limits established in Conditions D.1.4 and D.1.5.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage;

(4) The total VOC usage for each month at each press;

(5) The continuous temperature records (on an hourly average basis) the regenerative thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack tests; and

(6) Daily records of the duct pressure or fan amperage for the regenerative thermal oxidizer.

(b) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Appendix A: Emissions Calculations
VOC From Printing Press ID #3

Company Name: Mignone Communications
Address City IN Zip: 880 East State St., Huntington, IN 46750
Administrative Amendment: 069-18356
Plt ID: 069-00059
Reviewer: Aida De Guzman
Date: January 5, 2004

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press #3	1378	19.69	171132

INK VOCS

Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)	Control 'Efficiency	Emissions After Control tons/yr
Inks							
Process Yellow	1.00	51.85%	80.00%	171132	35.49	71.25%	10.20
Process Magenta	1.00	46.50%	80.00%	171132	31.83	71.25%	9.15
Process Cyan	1.00	47.07%	80.00%	171132	32.22	71.25%	9.26
Process Black	1.00	43.56%	80.00%	171132	29.82	71.25%	8.57
Solvents							
Fountain Solution	0.13	86%	100.00%	171132	9.57	71.25%	2.75
Blanket Wash, Cleane	0.09	99%	100.00%	171132	7.62	0.00%	7.62
				Total Emissions	**52.68**		**20.58**

METHODOLOGY

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds
Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))